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JR Arts And Crafts Co., LTD

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

YONG SUCK LEE,

Debtor.

Case No: 18-11532(VFP)

Chapter 13

Hearing Date: Jan. 3, 2019

10:00 AM

CERTIFICATION IN OPPOSITION TO DEBTOR'S MOTION FOR AN ORDER EXPUNGING PROOF OF CLAIM AND OTHER RELIEF

- I, Jae Y. Kim, hereby certify:
- 1. I am an attorney at law of the State of New Jersey and represent JR Arts And Crafts Co., LTD ("JR Arts"), a creditor herein.
- 2. I submit this certification in opposition to the Debtor's Motion For an Order Expunging Proof of Claim and For Other Relief.
- 3. JR Arts objects to the Debtor's Motion as it is not ripe for adjudication at this time.

Case 18-11532-VFP Doc 98 Filed 12/27/18 Entered 12/27/18 19:03:49 Desc Main Document Page 2 of 2

Case No: 18-11532 (VFP)
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EXPUNGING PROOF OF CLAIM AND OTHER RELIEF

4. Debtor's Motion to Expunge should be denied pending the conclusion of discovery and based on whether JR Arts files an appropriate Adversary Proceeding in a timely manner.

I certify the foregoing statements made by me are true. I am aware that if any of the statements are willfully false I am subject to punishment.

Dated: December 27, 2018

<u>/s/Jae Y. Kim</u>

Jae Y. Kim, Esq.